

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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ANDREA TANTAROS,

Plaintiff,

- against -

FOX NEWS NETWORK, LLC, ROGER AILES, WILLIAM
SHINE, IRENA BRIGANTI, PETER A. SNYDER,
DISRUPTOR, INC., and JOHN DOES 1-50,

Defendants.
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17 Civ. 2958 (GBD)

**REPLY DECLARATION IN FURTHER SUPPORT OF MOTION FOR SANCTIONS BY
DEFENDANTS FOX NEWS NETWORK AND IRENA BRIGANTI**

LINDA C. GOLDSTEIN declares as follows under penalty of perjury:

1. I am an attorney duly admitted to practice before this Court and am a partner at Dechert LLP, 1095 Avenue of the Americas, New York, New York, counsel to Defendants Fox News Network, LLC and Irena Briganti in this case. I submit this declaration to submit relevant documents in further support of the Motion by Defendants Fox News Network, LLC and Irena Briganti for Sanctions Pursuant to Fed. R. Civ. P. 11(c).

2. Attached hereto as Exhibit 1 is a true and correct copy of an email from Andrea Tantaros to Dianne Brandi, general counsel to Fox News Network, LLC, dated October 22, 2014.

3. Attached hereto as Exhibit 2 is a true and correct copy of the Gmail Sign-in & Security webpage downloaded under my supervision from the public Gmail website, myaccount.google.com/security, on July 6, 2017.

I declare under penalty of perjury that the foregoing is true and accurate.

Dated: New York, New York
July 12, 2017

/s/ Linda C. Goldstein

Linda C. Goldstein